



# Outpatient Quality Reporting Program

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## Support Contractor

### Calendar Year (CY) 2020 Outpatient Prospective Payment System (OPPS/ Ambulatory Surgical Center (ASC) Proposed Rule: Hospital Outpatient Quality Reporting (OQR) Program

#### Questions & Answers

##### Speaker:

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**September 18, 2019**

**10:00 a.m. ET**

- Question:** The proposed removal of OP-33, beginning with CY 2022 payment determination, would be for what abstraction time period?
- Answer:** If OP-33 is finalized for removal beginning with CY 2022 payment determination, your last data submission would be on May 15, 2020, using the 2019 reporting period (2019 encounters). You would no longer collect data beginning with January 1, 2020 encounters.
- Question:** I thought there was a proposal to remove OP-29 for CY 2020; is that still a possibility?
- Answer:** In the CY 2019 Proposed Rule, OP-29 was proposed to be removed. However, this was not finalized and OP-29 remains in this program. In this current Proposed Rule, there are no proposals regarding OP-29.
- Question:** When you mention the proposed removal of OP-33, beginning with CY 2022 payment determination, does that mean, if finalized for removal, the last quarter of data that is required to be reported for this measure would be Q1 2020 or Q4 2019?
- Answer:** OP-33 is a web-based measure that is reported annually. If finalized for removal beginning with CY 2022 payment determination, you would submit your last data submission on May 15, 2020, using the 2019 reporting period (2019 encounters). You would no longer collect data beginning with January 1, 2020 encounters.
- Question:** If the proposed change is finalized, what abstraction discharge period does the proposed OP-33 impact?



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**Answer:** If the proposed change for QP-33 is finalized for CY 2022 payment determination, the last time you would report for this measure would be May 15, 2020, using the encounters from January 1 through December 31, 2019.

**Question:** **What abstraction year will removal of OP-33 begin with?**

**Answer:** If OP-33 is finalized for removal beginning with CY 2022 payment determination, you would submit your last data submission on May 15, 2020, using the 2019 reporting period (2019 encounters). You would no longer collect data beginning with January 1, 2020 encounters.

**Question:** **For OP-33, some physicians are moving towards stereotactic treatments at 35Gy/5fxns. How will this affect our current results until the measure is removed in 2022?**

**Answer:** You would continue to collect data based on the OP-33 Specification Manual 12.0a requirements.

**Question:** **Will the Ambulatory Surgical Center (ASC) 1-4 measures be claims-based or chart-abstracted measures?**

**Answer:** In this Proposed rule, CMS is requesting comment on these measures, as well as the submission method. Any comments and provider feedback will be addressed in the Final Rule.

**Question:** **What process is used for collection of ASC measures? Will it be chart abstraction, discharge coding, hospital collected, or CMS collects via claims processing?**

**Answer:** In this Proposed rule, CMS is requesting comment on these measures, as well as the submission method. Any comments and provider feedback will be addressed in the Final Rule.

**Question:** **Please clarify; do we continue to abstract OP-33 through 2019 and 2020?**

**Answer:** If OP-33 is finalized for removal beginning with CY 2022 payment determination, you would submit data for the last time by May 15, 2020, using the 2019 reporting period (2019 encounters). You will no longer collect data beginning with January 1, 2020 encounters.

**Question:** **The Hospital OQR Program proposed and final rulings refer to the term CY 2020 and Inpatient (IP) refer to Fiscal Year (FY) 2020. What is the difference?**

**Answer:** For this program, CY 2020 refers to the timeframe from January 1 through December 31 of any given year. CMS is aware that different programs refer to different timeframes and is seeking to align these terms moving forward.



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- Question:** If a Critical Access Hospital (CAH) has a surgical department, should they be reporting the ASC measures?
- Answer:** If a hospital has a surgical department and is billing under the hospital's CMS Certification Number (CCN), they would report for the Hospital OQR Program. To participate in the ASCQR Program, the facility would need to be billing under a National Provider Identifier (NPI) and Medicare payment through OPPS. CAHs are not required to participate in the OQR program but may do so voluntarily.
- Question:** For the CY 2022 payment determination, that covers 2019 data, correct?
- Answer:** The CY 2019 reporting period (or patient encounter period) will be reported in the 2020 submission period for the 2021 payment determination. To assist with the reporting and submission periods for all measures, you may access our *Important Dates* document at <https://www.qualityreportingcenter.com/globalassets/2019/08/oqr/hospital-oqr-important-dates-2021-payment-determination.pdf>.
- Question:** Refresh my memory as to when we will see the Final rule for CY 2022?
- Answer:** We are currently addressing the CY 2020 Proposed Rule. Typically, the Final Rule is published in November; this would be for the CY 2020 Final Rule.
- Question:** We have an ASC that is part of our hospital and it does not have a separate Medicare Number. Would the ASC measures apply to us?
- Answer:** If you are billing using your hospital's CCN, then your hospital should report under the Hospital OQR Program. If your surgery center bills under their own NPI, then they would be responsible to report to the ASCQR Program.
- Question:** Can you repeat the calendar year and payment determination year using the CY 2022 payment determination as an example?
- Answer:** The CY 2022 payment determination year refers to the year your facility will receive Medicare payment. This will be reflective of encounters in 2019, which you submit in 2020.
- Question:** If the four safety patient measures are passed, will it be data for 2020 to be reported in May 2021 as a yearly web-based submission?
- Answer:** In this Proposed rule, CMS is requesting comment on these measures, as well as the submission method. The Proposed Rule did not address a definitive time line for data submission. Any comments and provider feedback will be addressed in the Final Rule.